

## EXHIBIT A

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3  
4 IN THE CIRCUIT COURT OF THE STATE OF OREGON  
5 FOR THE COUNTY OF MULTNOMAH

6 COLLABORATIVE VISION LLC, an Oregon  
7 limited liability company,

8 Plaintiff,

9 vs.

10 Q5ID, INC., an Oregon corporation,

11  
12 Defendant.  
13

Case No. 23CV15182

**OFFER TO ALLOW JUDGMENT ON  
COUNT THREE**

14 Pursuant to ORCP 54 E, Q5Id, Inc. offers to allow judgment to be taken against it by  
15 plaintiff in the total amount of Two-Hundred Thousand Dollars (\$200,000.00) for Plaintiff's Count  
16 Three (the Promissory Note). This amount is inclusive of all damages and recoverable expenses  
17 to plaintiff, and exclusive/inclusive of attorney fees, costs and disbursements. In addition, plaintiff  
18 may file a petition for costs, disbursements, attorney fees up to the date of this offer, and any other  
19 allowances pursuant to ORCP 68 of which the Court will determine what is allowed and reasonably  
20 under the normal factors and statutory requirements. Defendant reserves the right to file any  
21 objections and responses.

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1 If not accepted and filed within seven (7) days of the time it was served, this offer is deemed  
2 withdrawn pursuant to ORCP 54 E(3).

3 This offer shall not be given in evidence at trial, nor shall the offer be mentioned during  
4 trial.

5 DATED this 16<sup>th</sup> day of November, 2023 O'HAGAN MEYER PLLC  
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7  
8 By: s/ Bradley J. Krupicka  
9 Bradley J. Krupicka, OSB #104318  
10 bkrupicka@ohaganmeyer.com  
11 Alexandra K. McLain, OSB #184103  
amclain@ohaganmeyer.com  
Attorneys for Defendant O5id, Inc.

12  
13 Plaintiff accepts this offer on this \_\_\_\_\_ day of November, 2023.  
14

15 LYNCH MURPHY MCLANE LLP  
16

17 By: \_\_\_\_\_  
18 Peter C. Richter, OSB #711465  
19 prichter@lynchmurphy.com  
20 Attorneys for Plaintiff  
21  
22  
23  
24  
25  
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**CERTIFICATE OF SERVICE**

I certify that I served the foregoing **OFFER TO ALLOW JUDGMENT ON COUNT THREE**  
on the following attorneys by the method indicated below on the 16th day of November, 2023:

***Attorneys for Plaintiff:***

Peter C. Richter  
LYNCH MURPHY MCLANE LLP  
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E-Mail: [pmoore@lynchmurphy.com](mailto:pmoore@lynchmurphy.com)

<input checked="" type="checkbox"/>	Via First Class Mail
<input type="checkbox"/>	Via Federal Express
<input type="checkbox"/>	Via Facsimile
<input type="checkbox"/>	Via Odyssey E-File&Serve
<input checked="" type="checkbox"/>	Via E-Mail

O'HAGAN MEYER PLLC

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*Attorneys for Defendant Q5id, Inc.*